

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	
)	Civil Action No. 1:23-cv-09518-PAE
v.)	
)	Hon. Paul A. Engelmayer
SOLARWINDS CORP. and TIMOTHY G.)	
BROWN,)	<u>ORAL ARGUMENT REQUESTED</u>
)	
Defendants.)	

DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the annexed Declaration of Serrin Turner and all exhibits attached thereto, dated April 25, 2025; the separately bound Parties' Joint Statement of Undisputed Facts (ECF No. 166), dated April 18, 2025, and Defendants' Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1, dated April 25, 2025; and the accompanying Memorandum of Law, dated April 25, 2025, the undersigned hereby moves this Court on behalf of Defendants SolarWinds Corp. and Timothy G. Brown, before the Honorable Paul A. Engelmayer, in Courtroom 1305 of the United States District Courthouse for the Southern District of New York, located at 40 Foley Square, New York, NY 10007, for an order granting Defendants' Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, and for such other relief as the Court deems just and proper.

Dated: April 25, 2025
New York, New York

Respectfully submitted,



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